

 SCHNEIDER WALLACE  
COTTRELL KONECKY LLP

January 8, 2021

**VIA CM/ECF**

The Honorable J. Paul Oetken  
United States District Court  
Southern District Of New York  
40 Foley Square, Room 2101  
New York, New York 10007

Re: *Haley v. Teachers Insurance and Annuity Association of America*  
*Case No. 1:17-cv-00855*

Dear Judge Oetken:

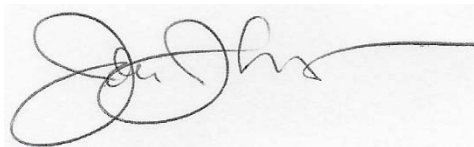
Plaintiff Melissa Haley, by and through her undersigned counsel, in accordance with paragraph E(ii)(b) of Your Honor's Individual Practices in Civil Cases, requests leave to file sealed copies of the Declaration of Todd S. Collins In Support of Opposition to Defendant's Motion to Strike or Preclude the Opinions of Plaintiff's Expert and the Exhibits thereto.

Plaintiff seeks leave to file under seal because these documents reference extensively materials that Defendant Teachers Insurance and Annuity Association has designated as confidential under the Stipulation and Protective Order, entered July 1, 2019 (Dkt. 60). Plaintiff takes no position on Defendant's confidential designations in the referenced documents, but reserves the right to challenge the confidentiality designation made by Defendant.

Thank you for your consideration of this matter.

Sincerely,

SCHNEIDER WALLACE  
COTTRELL KONECKY LLP



John J. Nestico  
Attorney at Law

cc: All Counsel (via ECF)



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